



- c. A Jail-Conditions Class consisting of all persons who, at any time since February 8, 2010, were held in the City of Ferguson jail (Count Four).
  - d. A Warrant Class consisting of all persons who have, at any time since February 8, 2010, been held in jail by the City of Ferguson after being arrested on a warrant issued by the City (Count Three).
  - e. A Post-Judgment Class consisting of all persons who have, at any time since February 8, 2010, been jailed by the City of Ferguson because of their non-payment in connection with a prior judgment (Counts Two, Five, and Six).
  - f. A Declaratory and Injunctive Class consisting of all persons who currently owe or who will incur debts to the City of Ferguson from fines, fees, costs, or surcharges arising from judgments in cases prosecuted by the City (Counts Two, Five, and Six).
3. Pursuant to Local Rule 4.02(A), Plaintiffs hereby request that the Court exercise its discretion and order oral argument, as such argument would be useful to the Court's analysis of the facts and the law in this case.

Dated: November 19, 2021

Respectfully submitted,

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